

## (Caption of Case)

Application of South Carolina Electric & Gas  
Company for a Certificate of Environmental  
Compatibility and Public Convenience and Necessity  
for the Construction and Operation of a 230 kV  
Transmission Line from its V.C. Summer, etc.

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET

NUMBER: 2011 - 325 - E

(Please type or print)

Submitted by: Danny C. CroweSC Bar Number: 1480Address: PO Box 1473Telephone: 803-227-4239Columbia, SC 29202Fax: 803-400-1471

Other: \_\_\_\_\_

Email: DCrowe@TurnerPadget.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☒ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input checked="" type="checkbox"/> Other: Notice of	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	Intervention	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

REC'D  
PSC SC  
MAIL / DMS

RETURN DATE: 06/01/11  
SERVICE: OK

# TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

CHARLESTON  
COLUMBIA  
FLORENCE  
GREENVILLE  
MYRTLE BEACH

REPLY TO:

**Danny C. Crowe**

E-Mail: DCrowe@TurnerPadget.com  
Writer's Direct Dial: (803) 227-4239  
Direct Fax: (803) 400-1471

September 7, 2011

Jocelyn Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Suite 100  
Columbia, SC 29210

RE: Application for South Carolina Electric & Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 230 kV Transmission Line from its V.C. Summer Switchyard #1 to its Killian Transmission Substation and two 230 kV Transmission Lines from its V.C. Summer Switchyard #2 To its Lake Murray Transmission Substation  
Docket No: 2011-325-E

Dear Ms. Boyd:

Enclosed please find the original and one copy each of a Notice of Appearance of Counsel and a Notice of Intervention as a Party by the Town of Blythewood for filing in the above-referenced matter, along with a Certificate of Service and Cover Sheet. We would appreciate it you would file the original and return clocked-in copies of both documents to our courier.

With kind regards, we are,

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Danny C. Crowe

BUSINESS • LITIGATION • SOLUTIONS

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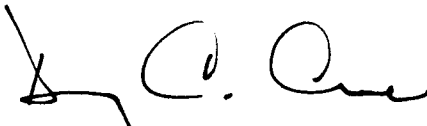
**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2011-325-E**

IN RE:

Application of South Carolina Electric & )  
Gas Company for a Certificate of )  
Environmental Compatibility and Public )  
Convenience and Necessity for the )  
Construction and Operation of a 230 kV )  
Transmission Line from its V.C. Summer )  
Switchyard #1 to its Killian Transmission )  
Substation and two 230 kV Transmission )  
Lines from its V.C. Summer Switchyard #2 )  
To its Lake Murray Transmission Substation) )  
\_\_\_\_\_ )

**NOTICE OF APPEARANCE  
OF COUNSEL FOR THE TOWN OF  
BLYTHEWOOD**

The undersigned hereby give notice of their appearance as counsel for the Town of Blythewood in the above-captioned matter.



Danny C. Crowe  
Shannon F. Bobertz  
Turner Padget Graham & Laney P.A.  
Post Office Box 1473  
Columbia, South Carolina 29202  
Tel: (803) 254-2200  
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[SBobertz@TurnerPadget.com](mailto:SBobertz@TurnerPadget.com)

**ATTORNEYS FOR THE TOWN OF  
BLYTHEWOOD**

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2011-325-E**

IN RE:

Application of South Carolina Electric & )  
Gas Company for a Certificate of )  
Environmental Compatibility and Public )  
Convenience and Necessity for the )  
Construction and Operation of a 230 kV )  
Transmission Line from its V.C. Summer )  
Switchyard #1 to its Killian Transmission )  
Substation and two 230 kV Transmission )  
Lines from its V.C. Summer Switchyard #2 )  
To its Lake Murray Transmission Substation) )  
\_\_\_\_\_ )

**NOTICE OF INTERVENTION AS  
A PARTY BY THE TOWN OF  
BLYTHEWOOD**

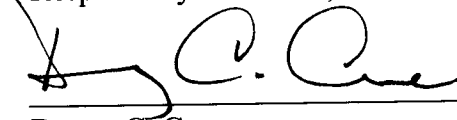
The Town of Blythewood ("Blythewood"), pursuant to S. C. Code section 58-33-140 (1) (c), hereby notices its intervention as a party in the above-captioned proceeding. Blythewood states the following grounds in connection with its intervention:

1. The Town of Blythewood is a municipality and political subdivision of the State of South Carolina that is charged with and undertakes land use planning, as well as other local governmental functions, within its geographical boundaries. Blythewood is entitled to participate as a party to the certification proceeding pursuant to S. C. Code section 58-33-140(1)(c). The Town is entitled to receive service of a copy of the Application under subsection (2) of S.C. Code section 58-33-120, was served with a copy of the Application by SCE&G on August 10, 2011, and files this notice within thirty days after the date it was served with a copy of the Application.

2. Blythewood objects to the location of the proposed transmission lines within the Town limits as proposed by the Application. The proposed transmission lines, among other things, will pass directly through the Blythewood Road exit of Interstate Highway 77 and through the business section of the Town. The size and location of the proposed transmission lines are incompatible with, and will adversely impact, the appearance and development of the area near the proposed lines. The height, configuration, spacing and visibility of the lines will adversely affect the aesthetics, attractiveness and development of the Town, including interference with proposed Town and SCDOT landscaping and other beautification projects at the location of the proposed lines at the Blythewood Road/ I-77 exit. SCE&G failed to consider and propose alternate routes that would avoid or minimize the incompatibility and impact of the proposed lines.

3. At this stage of the proceeding, Blythewood has not fully determined all positions and all grounds for its opposition to the Application, and reserves its rights to assert additional positions and grounds.

Respectfully submitted,



Danny C. Crowe  
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[SBobertz@TurnerPadget.com](mailto:SBobertz@TurnerPadget.com)

ATTORNEYS FOR THE TOWN OF  
BLYTHEWOOD

September 7, 2011

**CERTIFICATE OF SERVICE**

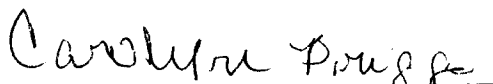
I, Carolyn Briggs, an employee of Turner, Padget, Graham & Laney, P.A., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:           **Notice of Intervention as a Party by the Town of Blythewood  
Notice of Appearance of Counsel**

Counsel Served:    K. Chad Burgess, Esquire  
Associate General Counsel  
SCANA Corporation  
Mail Code C222  
220 Operation Way  
Cayce, South Carolina 29033

Matthew W. Gissendanner, Esquire  
Senior Counsel  
SCANA Corporation  
Mail Code C222  
220 Operation Way  
Cayce, South Carolina 29033

C. Dukes Scott, Executive Director  
S.C. Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

  
\_\_\_\_\_  
Carolyn B. Briggs  
Paralegal to Danny C. Crowe

9/7, 2011.